

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Andrea M. Camarote
Debtor

SN Servicing Corporation as servicer
for U.S. Bank Trust National
Association, as Trustee of the FW
Series I Trust

v.

Andrea M. Camarote
Scott F. Waterman
Respondents

CASE NO.: 24-13536-amc

CHAPTER 13

Judge: Ashely M. Chan

Hearing Date: 1/29/2025 at 10:00 AM

Objection Deadline:

OBJECTION TO CONFIRMATION OF PLAN

PLEASE TAKE NOTICE that SN Servicing Corporation as Servicer for U.S. Bank Trust National Association, as Trustee of the FW Series I Trust (“Secured Creditor”), the holder of a mortgage on real property of the Debtor, located at 3128 Chatham St, Philadelphia, PA 19134, by and through its undersigned attorneys, hereby objects to the confirmation of the Chapter 13 Plan on grounds including:

1. Debtor filed a Chapter 13 Plan on November 13, 2024.
2. Secured Creditor does not necessarily object to the Debtor's proposed sale of the property as the proposed plan indicates, rather Secured Creditor objects to confirmation unless a consent order is entered giving stay relief should the property not be sold within an appropriate time frame that the Secured Creditor agrees to. Furthermore, Debtor's proposed plan fails to provide any supporting information or documentation regarding the sale, retaining a broker, listing agreement, etc. If there is no equity in the property, Secured Creditor requests that regular, monthly mortgage payments be made pending the sale, and that Secured Creditor must be able to review all short sale offers. If there is in fact equity in the property, Secured Creditor objects to any order unless the loan is paid in full based off a payoff provided at closing. The minimum sales amount as stated in the proposed Plan is insufficient to provide for Creditor's total debt in the amount of approximately \$236,241.06, as set forth in Claim 1-1 filed on October 25, 2024.

In the event any portion of the claim is deemed to be an unsecured claim as defined by the Code, objection is hereby made pursuant to 11 U.S.C. 1325(a)(4) and 1325(b), *et seq.* unless the plan provides for full payment of the claim.

Dated: November 18, 2024

By: /s/ Lauren M. Moyer
Lauren M. Moyer, Esq.
FRIEDMAN VARTOLO LLP
Attorneys for SN Servicing Corporation as servicer
for U.S. Bank Trust National Association, as
Trustee of the FW Series I Trust
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
T: (212) 471-5100
F: (212) 471-5150
Bankruptcy@FriedmanVartolo.com

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CERTIFICATE OF SERVICE OF OBJECTION TO CONFIRMATION OF PLAN

I certify under penalty of perjury that I caused to be served the above-captioned pleading on the parties at the addresses specified below or on the attached list on November 18, 2024.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: first-class mail and electronic notification

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the full name, email address, and where applicable the full name of the person or entity represented, for each party served by electronic transmission is listed under the heading “Service by NEF,” and the full name and complete postal address for each party served by mail are listed under the heading “Service by First-Class Mail.”

EXECUTED ON: November 18, 2024

By: /s/ Lauren M. Moyer
Lauren M. Moyer, Esq.
FRIEDMAN VARTOLO LLP
Attorneys for SN Servicing Corporation as servicer
for U.S. Bank Trust National Association, as
Trustee of the FW Series I Trust
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
T: (212) 471-5100
F: (212) 471-5150
Bankruptcy@FriedmanVartolo.com

Service by Regular Mail

Andrea M. Camarote
3128 Chatham Street
Philadelphia, PA 19134
Bankruptcy Debtor

Service by NEF

Brad J. Sadek, Esq.
1500 JFK Boulevard,
Ste 220
Philadelphia, PA 19102
Attorney

Scott F. Waterman
2901 St. Lawrence Avenue,
Suite 100
Reading, PA 19606
Bankruptcy Trustee

United States Trustee
Robert N.C. Nix Federal Building
900 Market Street
Suite 320
Philadelphia, PA 19107
United States Trustee